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9 *Barclays Bank Delaware*

10 **UNITED STATE DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 PEGGY A. ROLDAN,

13 Plaintiff,

14 vs.

15 TRANSUNION, LLC; BARCLAYS BANK,  
16 DELAWARE,

17 Defendants.

Case No.: 2:19-cv-01302-JCM-EJY

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEFENDANT  
BARCLAYS BANK DELAWARE'S  
TIME TO RESPOND TO COMPLAINT**

**(SECOND REQUEST)**

18 This Stipulation to Extend Time to Respond to Complaint is made by and between  
19 Plaintiff Peggy A. Roldan ("Plaintiff") and Defendant Barclays Bank Delaware ("Barclays")  
20 through their respective counsel, in light of the following facts:

**RECITALS**

21 A. Plaintiff filed the Complaint ("Complaint") against Barclays on or about July  
22 29, 2019.

23 B. Barclays was served with the Complaint on August 6, 2019.

24 C. The Court extended Barclays' original deadline to respond from August 27,  
25 2019 to September 26, 2019.

26 D. The parties agreed to extend Barclays' time to respond to the Complaint through  
27 October 17, 2019, in order to give Barclays further time to investigate Plaintiff's claims and  
28 prepare a proper response, and for the parties to discuss a potential resolution of this matter.

E. There is good cause to grant this stipulation because Barclays is still in the  
process of investigating the claims and is working to provide opposing counsel with

1 documentation. Upon receipt of that documentation, Barclays is hopeful that the matter can be  
2 resolved without further litigation.

3 F. Pursuant to Local Rule IA 6 September 20-2 and Local Rule 7.1, Plaintiff and  
4 Barclays respectfully request that the Court extend Barclays' time to respond to Plaintiff's  
5 Complaint through October 17, 2019.

6 **STIPULATION**

7 NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays  
8 has up to and including October 17, 2019, to file a response to Plaintiff's Complaint.

9  
10 **IT IS SO STIPULATED**

11 DATED: September 20, 2019

LEWIS ROCA  
ROTHGERBER CHRISTIE LLP

12  
13 By: /s/ J Christopher Jorgenson  
J Christopher Jorgenson  
Attorneys for Defendant  
Barclays Bank Delaware

14  
15  
16 DATED: September 20, 2019

HAINES & KRIEGER, LLC

17  
18 By: /s/ David H. Krieger  
David H. Krieger  
Attorney for Plaintiff  
Michelle H. Pro

19  
20  
21 **ORDER**

22 **IT IS SO ORDERED**

23 Raymond J. Zouchak  
24 United States District Judge

25 DATED September 23, 2019  
26  
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